

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**LA UNION DEL PUEBLO ENTERO, SARAH  
DOE, MARY DOE, JOHN DOE, AND JAMES  
DOE.,**

***Plaintiffs,***

**v.**

**GREGORY ABBOTT ET AL.,**

***Defendants.***

**CIVIL ACTION NO. 1:24-CV-270-DAE**

**STATE UNOPPOSED MOTION TO WITHDRAW COUNSEL**

State Defendants Gregory Abbott, in his official capacity of Governor of Texas, Steven C. McCraw, in his official capacity as Director of Texas Department of Public Safety, Warren K. Paxton, in his official capacity as the Texas Attorney General (collectively, “State Defendants”) file this this Unopposed Motion to Withdraw Heather L. Dyer and would respectfully show the following:

Heather L. Dyer is currently designated as an attorney of record for State Defendants. Ms. Dyer is no longer with the Office of the Attorney General; therefore, it is necessary to withdraw her from this case.

State Defendants will continue to be represented by Ryan D. Walters, Kathleen Hunker, David Bryant, and Garrett Greene.

For the reasons stated above, State Defendants respectfully request that the Court grant this Unopposed Motion to Withdraw Heather L. Dyer as Counsel and remove Ms. Dyer from all further electronic notifications regarding this case.

Date: March 20, 2025

Respectfully submitted.

**KEN PAXTON**  
Attorney General

**DAVID BRYANT**  
Senior Special Counsel  
Tex. State Bar No. 03281500

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/s/Kathleen Hunker  
**KATHLEEN HUNKER**  
Deputy Chief, Special Litigation Division  
Tex. State Bar No. 24118415

**COUNSEL FOR STATE DEFENDANTS**

#### **CERTIFICATE OF CONFERENCE**

I certify that on March 20, 2025, I conferred via email with counsel for Plaintiffs regarding the relief requested in this motion. Counsel for Plaintiffs stated that they do not oppose this Motion.

/s/Kathleen Hunker  
**KATHLEEN HUNKER**

#### **CERTIFICATE OF SERVICE**

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on March 20, 2025 and that all counsel of record were served by CM/ECF.

/s/Kathleen Hunker  
**KATHLEEN HUNKER**